

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/USPS-101)

The United States Postal Service hereby provides the response to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-101, filed on October 21, 1997.

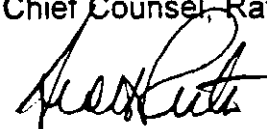
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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November 4, 1997

RESPONSE OF THE U.S. POSTAL SERVICE TO INTERROGATORIES
OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-101. The following questions refer to the likely implementation date assumed by several Postal Service witnesses.

- (1) Please refer to October 16, 1997, Tr.9/4584, lines 12-14, where witness Tayman states "the assumption that the rates as filed" will be implemented "in June of '98".
- (2) Please refer to the testimony of witness Tolley, (USPS-T-6) at page 4, lines 14-15, where he states, *After-rates Test Year volumes are projected assuming that proposed rates will be implemented on October 1, 1997.*"
- (3) Please refer to the response of witness Lion to OCA/USPS-T24-96, where he states, "the 'implementation date' [] has not been determined."
 - a. The three statements concerning the "implementation date" for the proposed appear to be inconsistent. Please reconcile them.
 - b. Please confirm that the Postal Service assumes that there will be multiple implementation dates for proposed rates in this proceeding. If you do not confirm, please explain, and state whether the Postal Service assumes that there will be one implementation date for all proposed rates.
 - c. Please confirm that the Postal Service assumes that proposed rates in this proceeding will be implemented in fiscal year 1998. If you do not confirm, please explain.

Response:

- a. - c. The first statement referred to above, made by Mr. Tayman during his oral testimony, refers to the June rate implementation assumption made for the Postal Service's FY 98 Operating Budget. Consistent with witness Tolley's statement, *test year after rates volume, revenue, and expense estimates reflected in the Docket R97-1 filing assume a rate implementation on October 1, 1997, the first day of the hypothetical test year.* Witness Lion is today revising his response to interrogatory OCA/USPS-T24-96b so that it no longer refers to the implementation

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date, although it is true that the actual implementation date has yet to be determined.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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